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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
MATTHEW H. PETERS, *et al.*  
  
Defendants.

No. 2:24-cv-00287-WBS-CKD

REQUEST FOR ENTRY OF DEFAULT

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, the United States requests that the Clerk of the Court enter Default in this matter against Defendants Inland Medical Consultants LLC, Professional Rx Pharmacy LLC, Strand View Enterprises LLC, Synergy Medical Systems LLC, Synergy RX LLC (collectively, the “Defaulted Parties”)

On January 22, 2024, the United States filed its Complaint (ECF No. 1). The United States filed a First Amended Complaint pursuant to Rule 15(a) of the Federal Rules of Civil Procedure on March 18, 2024 (ECF No. 5). Pursuant to Rule 4 of the Federal Rules of Civil Procedure, the United States served the Defaulted Parties with the Summons and First Amended Complaint on the following dates:

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Party	Date Served	ECF No.
Inland Medical Consultants LLC	April 2, 2024	(Dkt. 13 at 1)
Professional Rx Pharmacy LLC	April 9, 2024	(Dkt. 13 at 7)
Strand View Enterprises LLC	August 26, 2024	(Dkt. 54 at 1) (Dkt. 13 at 15) <sup>1</sup>
Synergy Medical Systems LLC	April 5, 2024	(Dkt. 14 at 14)
Synergy RX LLC	April 5, 2024	(Dkt. 25 at 11)

Pursuant to Rule 12(a)(1)(A)(i) of the Federal Rules of Civil Procedure, the Defaulted Parties had 21 days after being served to respond. As of the date of this Request, the United States has not received a responsive pleading from any of the Defaulted Parties, nor is there record of an answer or other response entered on the Court's electronic docket. Filed contemporaneously with this Request is an affidavit of counsel, attesting the same.

Rule 55(a) of the Federal Rules of Civil Procedure provides that "[w]hen a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party's default." Accordingly, the United States requests that the Clerk of the Court enter default against each of the Defaulted Parties for their failure to answer, plead, or otherwise defend.

Respectfully submitted,

PHILLIP A. TALBERT  
UNITED STATES ATTORNEY

By: Steven S. Tennyson  
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Assistant United States Attorneys  
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<sup>1</sup> The United States served Strand View Enterprises LLC twice to correct a typographical error in the defendant's name. For purposes of this request, the United States relies upon the later date of service.